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use of the claimed invention must result in a structural difference between the claimed invention and the prior art in order to patentably distinguish the claimed invention from the prior art. If the prior art structure is capable of performing the intended use, then it meets the claim. In a claim drawn to a process of making, the intended use must result in a manipulative difference as compared to the prior art." It is respectfully maintained that the claim limitations which are characterized in the Office Action as "intended use" are in fact express claim limitations which are neither taught nor suggested in the cited art. It is also respectfully maintained that a *prima facie* case of obviousness has therefore not been made.

Arguments

In section 6 of the Office Action, the REA (Resource-Event-Agent) limitations of the pending claims were characterized as "intended use." In support of the rejection, text from the Manual of Patent Examining Procedure (MPEP) section 2111.02 entitled "Effect of Preamble" was cited. However, this characterization ignores express claim limitations in all pending and rejected claims, which are found outside of the preambles of these claims. As described above, independent claim 1 recites a method of providing REA model based security, which includes the step of "identifying an association between a first object and a second object in an REA model." (Emphasis added). Independent claim 18 recites a computer readable medium with the same limitation. Independent claim 34 recites a system for providing security which includes the claim element of "a Resource-Event-Agent (REA) model configured to implement a first object, a second object, and an association between the first object and the second object." (Emphasis added). This system claim also expressly recites the limitation of "a security model configured to implement an association class object for the association between the first object and the second object in the REA model, such that properties of the association class object define security between the first object and the second object." (Emphasis added). Clearly, these are not merely statements of intended use, but rather are express claim limitations.

"The Examiner bears the initial burden of factually supporting any *prima facie* conclusion of obviousness. If the Examiner does not produce a *prima facie* case, the Applicant is under no

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obligation to submit evidence of nonobviousness." See MPEP § 2142. "To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations." (Emphasis added). See MPEP § 2142. Since the combination of Boozer and Colburn do not teach or suggest all of the claim limitations, a *prima facie* case of obviousness has not been established, and the rejection of all pending claims should be withdrawn.

Contrary to the assertion made in section 4 of the Office Action that Boozer teaches a "method/system/computer readable medium for providing Resource-Event-Agent (REA) model based security," and that the method/system/computer readable medium of Boozer includes "[i]dentifying an association between a first object and a second object in an REA model (page 1, paragraph 0016)," Boozer provides no such teaching of an REA model. A description of REA models is provided in the application, for example beginning at Page 2, line 5. No disclosure of REA models is provided by Boozer. Likewise, Colburn does not teach REA models or REA model based security. Since neither of Boozer and Colburn disclose REA models or REA model based security, it follows that they do not teach the REA model limitations recited in the claims and described above. Since neither Boozer nor Colburn disclose REA models or REA model based security, it is respectfully submitted that a combination of Boozer and Colburn cannot render independent claims 1, 18 and 34 obvious. Consequently, it is respectfully submitted that independent claims 1, 18 and 34 are in allowable form, along with dependent claims 3-17, 20-33, and 36-39. It is therefore respectfully requested that the rejection of all pending claims be withdrawn.

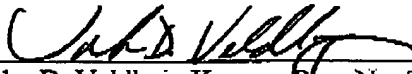
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The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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